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February 22, 2024

VIA ECF

Honorable Hector Gonzalez
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 6A South
Brooklyn, New York 11201

Re: *Mohabir v. Power Cooling Inc.*, 24 Civ. 843 (HG)
(Letter-Motion re: Extension to Respond to Complaint)

Dear Judge Gonzalez:

We represent Defendant Power Cooling Inc. in the above-referenced Action. Pursuant to Rule I.D of the Court's Individual Practices, and with Plaintiff's consent, Defendant requests an extension until March 29, 2024, to respond to the Complaint. This is the first time that Defendant makes this request.

Defendant's response to the Complaint is due by March 1, 2024. Earlier this week, Defendant retained our firm to represent it in this Action. Our firm needs additional time to review Plaintiff's allegations with our client and prepare a response to them. The requested extension, if granted, will not affect any other scheduled dates in this Action.

We thank the Court for its time and attention to this matter. The Parties are available to answer the Court's questions if necessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Gianfranco J. Cuadra', with a stylized, overlapping flourish.

Gianfranco J. Cuadra

cc: Counsel for Plaintiff (via ECF)